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8 UNITED STATES DISTRICT COURT - NORTHERN DISTRICT OF CALIFORNIA

9 TETYANA DORSANEO,

10 Case No.: 3:17 – CV – 00765

11 Plaintiff,

12 vs.

13 EDWARD DORSANEO,

14 DECLARATION OF DEFENDANT
15 EDWARD DORSANEO
16 SUPPORTING OPPOSITION TO
17 PLAINTIFF'S MOTION FOR SUMMARY
18 JUDGMENT

19 Defendant

20 Date: February 1, 2018
21 Time: 10:00am
22 Dept: Courtroom 2 / 17th Floor
23 Judge: Hon. Vince Chhabria

24 I, Edward Dorsaneo, am the Defendant in this case. I declare and state as follows, and if
25 called to testify, would competently testify to the same of my own personal knowledge:

- 26 1. I am a decorated veteran of the US Army, and a former Police Officer, sworn to defend the
27 Constitution of the United States of America.
- 28 2. The Superior Court of California for Sonoma County entered a final judgment of dissolution
29 of my short marriage to the Plaintiff on May 20, 2014.
- 30 3. That final judgment says that there will be “No Spousal Support by either party”, and that the
31 Court has no further jurisdiction to award spousal support.
- 32 4. I have relied on that understanding of that final judgment in all of my actions since that time.
33 I am recognized as a highly principled individual who faithfully keeps his agreements.
- 34 5. I have no idea why we are here before this Court for something I thought was concluded
35 nearly 4 years ago – it makes no sense to me.

36 DECLARATION OF DEFENDANT EDWARD DORSANEO SUPPORTING OPPOSITION
37 TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
38 CASE 3:17 – CV – 00765

1 6. I have ample evidence, in the form of documents, to impeach many of the sworn statements
2 made by the Plaintiff, including those statements she made on her I-485 petition, and I want
3 my day in Court, with a jury, to demonstrate her complete and utter lack of credibility, and
4 her willingness to lie to me, the jury, and this Court.

5 7. I have withdrawn and revoked my petition in support of the Plaintiff's Application to Adjust
6 her Status to that of a permanent resident. I have also withdrawn and revoked my Affidavit
7 of Support [form I-864], to the extent that it became or continues to be effective in any
8 manner. Exhibit 1 attached hereto is a true and accurate copy of that withdrawal.

9 8. I have already been borrowing money to pay legal fees and it will already take years to pay
10 back those loans on the pension income I have available to me.

11 9. The first notice I had of this case was a demand letter from Mr. Winter in the amount of
12 approximately \$180,000 which including an un-endorsed copy of the complaint. I thought
13 the letter was from a scam artist and did not pay attention to it at that time. Shortly
14 thereafter, I received service and summons in this case, and located and paid for the services
15 of an attorney to respond.

16 10. I am experiencing health problems, stress, anxiety, worry, and losing sleep as a result of the
17 allegations in this complaint which are repugnant to the sensibility and violate my
18 understanding of the laws I am sworn to uphold. She is asking for a lifetime of indentured
19 servitude for a mistake I made, my marriage, that lasted only for a few weeks. The
20 settlement conference statement prepared by my attorney accurately represents my
21 understanding of the law and my feelings on the obligations I never agreed to with. I have
22 attached a true and accurate copy of that statement hereto as Exhibit 2.

23 11. At the settlement conference, Mr. Winter offered a demand of \$190,000, plus an additional
24 \$85,000 for his "attorney fees", despite the fact that the complaint only asks for about

DECLARATION OF DEFENDANT EDWARD DORSANEO SUPPORTING OPPOSITION
TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
CASE 3:17 - CV - 00765

1 \$40,000 and the new motion for summary judgment asks for about \$56,000. In my mind, his
2 offer was a “stick up” job, and not offered in good faith.

3 12. At that time, I resolved to investigate my ex-spouse to the best of my abilities, and
4 commenced a more thorough background check of her in her hometown of Kiev, Ukraine. I
5 provided photographs and other personal information to various investigators. That
6 background check produced a statement that my ex-spouse “Tetyana” had been known in
7 prostitution circles as “Elena” working for a firm known as Gia Escorts. I was devastated
8 and distraught -- there is no way I would have married her if I had known that she was a
9 prostitute. I was angry and have been very depressed since that time and did not pursue
10 further investigation.

11 13. Upon receipt of the current proposed motion for summary judgment, I decided to pursue the
12 investigation further and contacted Scott Filley, a private investigator.

13 14. I gave Scott the basic information I had from the previous investigation, and within minutes
14 he was able to produce a photo of Tetyana from an online archive of the website of Gia
15 Escorts under the label of “Elena”. My worst fears were confirmed and I feel so ashamed. I
16 have attached a copy of Scott’s report hereto as Exhibit 3.

17 15. I will be providing the results of this investigation to active law enforcement officers with
18 respect to the sworn statement under oath Tetyana made on her I-485 form, denying any prior
19 involvement in prostitution. She has committed a crime against this country, and a crime
20 against me, and she must be held accountable under law.

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DECLARATION OF DEFENDANT EDWARD DORSANEO SUPPORTING OPPOSITION
TO PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

CASE 3:17 – CV – 00765

1 I swear under the penalties of perjury that the foregoing is true and correct and that this
2 declaration was executed on January 18, 2018.

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4 /s/ Edward Dorsaneo
5 Edward Dorsaneo

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DECLARATION OF DEFENDANT EDWARD DORSANEO SUPPORTING OPPOSITION
TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT
CASE 3:17 - CV - 00765